The Value of Integrated Stormwater Planning

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Overview

- Why We Need Integrated Planning
- USEPA Integrated Planning Framework (IPF)
- Key Elements of an Integrated Plan (IP)
- Experience of other communities
- Making Integrated Planning A Reality in San Diego

Why Integrated Planning (IP)?

Concerns Raised by Mayors

- Communities faced substantial costs and insufficient funding
- Inflexible USEPA positions on decrees, Long-Term Control Plans
- SSOs, stormwater programs, other CWA issues
- Communities wanted to be able to maximize environmental benefit of their CWA actions given limited resources

EPA and State Concerns:

- Slow implementation progress on stormwater and LTCPs
- Weak long term planning, weaker commitments to act

Integrated Planning Framework

EPA's *Integrated Municipal Stormwater and Wastewater Planning Approach Framework* (IPF) issued 2012:

- Not a means to "dumb down" requirements
- Ability to pay should consider ALL Clean Water obligations
- Plan and sequence water work to focus first on high-return actions
- Schedule work consistent with ability to pay

Communities have been developing or considering IPs in OH, MA, IN, MD, RI, CO, NH, NY, MO, CA and other States

Overarching Principles

1. Maintain existing regulatory standards
2. Balance requirements to address most pressing issues first
3. Scope and development of an IP is a municipality's responsibility but needs to work for State
4. Innovative technologies are important tools

IPF Development Principles

1. Reflect State requirements/planning efforts; incorporate State input
2. Provide for meeting obligations by utilizing flexibilities in the CWA
3. Analyze various alternatives and sequencing of actions
4. Evaluate and incorporate effective, sustainable tech (e.g., GI)
5. Evaluate and address community impacts and disproportionate burdens
6. Ensure that existing obligations related to technology-based and core requirements are not delayed
7. Ensure that a solid financial strategy is in place
8. Meaningful stakeholder input throughout development

Potential Approach to Addressing IP Elements

1. *Obligations, Costs, and Schedules-* What we need to do, at what cost
2. *Financial Capabilities Assessment-* How much we can afford
3. *Near and Long Term Commitments-* How we will sequence action
4. *Demonstration that Goals will be Achieved-* Why these actions will meet water quality requirements/goals
5. *Prioritized Schedule-* How fast we can go, given financial constraints
6. *Clear Metrics and Process for Adaptation-* How we are accountable
7. *Communication/Stakeholder Process-* How we involve the public

Experience in other communities

- Great interest from *combined sewer system* communities
  - East and Midwest (Philadelphia, DC, Lima, OH)
  - Mostly implemented through consent decree revisions
- Most CA interest on *stormwater* side
  - Discussions with Santa Maria, LA cities, Bay Area, ***San Diego***
  - Interest in promoting multi-purpose infrastructure investments (e.g., capture, GI, flood control projects)
  - Interest in adjusting compliance schedules to implement comprehensive plans, considering financial feasibility
- Framework for sequencing investments ("bang for buck")
- Challenging to do through enforcement actions vs. permitting

Making IP a Reality in San Diego

- Integrated stormwater planning can fit the IPF model
- San Diego doing a good job assembling the pieces
- Recognizes size of the challenge given financial constraints
- Should offer greater reliability and certainty for all
- Need strong interim milestones and accountability (not a free pass)
- Will require Regional Board assistance:
  - Revise TMDL time schedules in Basin Plan
  - Compliance schedule in NPDES MS4 permit, some other edits
  - This takes time and resources but likely worth it
- EPA will be happy to continue assisting this effort